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March 29, 2011

**VIA ECF**

Hon. Roanne L. Mann  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Allstate Ins. Co. v. Etienne, et al.  
Docket No. CV 09-3582 (SLT)(RLM)  
RR File No.: 000999-01007

Dear Magistrate Judge Mann:

As you know, we represent Plaintiff Allstate Insurance Company ("Allstate") in the above-referenced matter. In order to facilitate continued discovery in this matter, we submit the attached proposed Agreed-Upon Protective Order and So-Ordered Stipulation Regarding Plaintiff's Production of Documents, which has been signed by counsel for Allstate and counsel for Defendants Viviane Etienne, M.D., V.E. Medical Care, P.C., Viviane Etienne Medical Care, P.C., and Jamaica Dedicated Medical Care, P.C.

We respectfully request that the Court "so-order" the Agreed-Upon Protective Order and So-Ordered Stipulation Regarding Plaintiff's Production of Documents, and appreciate the Court's attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

*Max Gershenoff*

Max Gershenoff (MG-4648)

Enclosure

cc: All counsel via ECF

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